Managing

Automotive Repair Shop Wastes

A Guide For Automotive Repair Shop Operators



Kentucky Natural Resources and Environmental Protection Cabinet Department for Environmental Protection Division of Waste Management

January 1995

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Why Should Automotive Repair Shops Properly Manage Wastes?

Automotive repair shops can and often do generate hazardous wastes. If improperly managed, these wastes may threaten worker safety, damage the environment, or put an entire community at risk. Shop wastes can pollute drinking water supplies if poured on the ground, down the drain or in a trash dumpster. Some may cause serious health problems if indiscriminately handled or discarded.

As an automotive repair shop operator, your role in protecting public health and the environment is vital. Good waste management practices are important to you for many reasons, among which are:

- You may save money by finding ways to reduce or recycle your wastes.
- You will ensure that you are in compliance with hazardous waste and solid waste regulations and can avoid costly penalties.
- You may gain customers who know they have made a wise choice when selecting a shop that protects the environment.
- You will join other automotive repair shops in your area that are taking pride in maintaining a clean and healthy environment.

Why Reduce and Recycle Your Wastes?

In addition to being environmentally responsible, reducing hazardous wastes in your repair shop makes good business sense. Source reduction, which actually means reducing the amount and/or toxicity of waste you generate, can help you:

- Save on hazardous waste management costs,
- Avoid long-term liability concerns, and
- Help create a healthier, safer work environment.

It may not be as difficult as you think. A good way to start is to walk through your shop and review all of the processes that use toxic chemicals or generate hazardous waste. Pages 5-22 in this booklet will help you determine which wastes are likely to be hazardous. As you review each process, ask yourself if you can modify the process in some way so that it does not produce hazardous waste. Some options to consider are:

1. Substituting a less toxic material

Switch to non-chlorinated compounds, such as a citrus-based solvent, for parts cleaning.

Always ask for a Material Safety Data Sheet (MSDS) before ordering any new product. The MSDS will give you valuable information about the product.

Remember that biodegradable does not necessarily mean environmentally safe or that the product is exempt from regulations.

2. Using sound operating practices

Always use funnels or pumps to dispense chemical.

Keep all chemicals in sealed containers with tight-fitting lids.

Keep lids on all solvents and turn off your solvent sink when not in use. Solvent losses due to evaporation, equipment leaks or spills and inappropriate usage can range from 25-40 percent.

Be aware that safe products that are mixed with hazardous substances (e.g., oil or heavy metals) may need to be handled as hazardous waste.

Seal floor drains. Do not allow any cleaning solutions to enter the sewer system unless they can be treated at the municipal wastewater treatment facility.

3. Changing your process

Switch to a recirculating spray cabinet for cleaning parts instead of using solvents or hot tanks.

Use dirty solvent first when cleaning parts. In addition, use a filter on parts washers to extend the life of the solvent.

Consider switching to a water-based cleaner instead of using chlorinated spray cans of brake cleaner or carburetor cleaner.

4. Recycling wastes and wastewater that you cannot reduce

Contract for a recycling service to pick up used solvent.

Consider an on-site distillation unit to recycle spent solvents.

Put dirty floor-washing water into your spray cabinet instead of down a drain.

How Do You Determine If Your Wastes Are Hazardous?

Sometimes sending a sample of waste to a laboratory for analysis is the only way to determine if the waste is hazardous. Important tests for automotive repair shops include those for pH, volatile organics, heavy metals, and total petroleum hydrocarbons. If you have a waste that needs to be tested, you may request a list of laboratories from the Kentucky Division of Waste Management (DWM). Addresses and phone numbers for the DWM central office and regional offices are listed on pages 23 and 24 of this booklet.

If you have a particular waste tested and continue to use the same source of material and industrial process, you may apply those test results when designating future batches of the same waste. For example, if you test your spent spray cabinet wash water and sludge once and find it to be non-hazardous, you may use your knowledge of that waste for future batches of that waste.

How Are Waste Generators Categorized?

In Kentucky, hazardous waste generators are ranked in the following three categories, depending on the quantity of hazardous waste produced:

<u>Category</u> <u>Quantity Generated</u>

Limited Quantity Generators Less than 220 pounds/month

Small Quantity Generators Between 220 and 2,200 pounds/month

Full Quantity Generators More than 2,200 pounds/month

NOTE: 220 pounds is approximately one-half of a 55-gallon drum

Limited quantity generators are not required to register with the Division of Waste Management, but are responsible for complying with 401 KAR 31:010, Section 5. They may keep hazardous waste on-site only if they generate less than 220 pounds per month and the total accumulated quantity does not exceed 2,200 pounds. When shipping off-site, limited quantity generators are not required to prepare a manifest, but must send their waste to 1) a permitted hazardous waste facility, 2) a registered recycling facility, or 3) a solid waste landfill that has written approval from the Division of Waste Management to accept the waste.

Small quantity generators and full quantity generators must comply with the requirements of 401 KAR Chapter 32. They must register with the Division of Waste Management to obtain an EPA ID Number. <u>Annual</u> registration and reporting are also required. Annual reports detail the type and amount of waste produced; the name of the transporter; and the treatment, storage, and disposal facility used. Small quantity generators and full quantity generators must adhere to specific on-site waste accumulation requirements as well. All waste shipped off-site by these generators must be properly manifested and hauled by a registered hazardous waste transporter.

Properly Managing ANTIFREEZE

ISSUE

Waste antifreeze containing ethylene glycol may be regulated as hazardous waste and should be handled as such. While less toxic, propylene glycol-based antifreeze should also be managed as hazardous. The waste produced as a result of flushing the radiator system with water typically is not hazardous.

DOs

- ✔ Recycle your antifreeze through a recycling service if possible.
- If you recycle antifreeze on the premises, filters and other recycling by-products may be hazardous. You will need to make a waste determination.
- ✓ Consider keeping antifreeze in two separate, closed containers: one marked "WASTE ANTIFREEZE ONLY" for antifreeze that cannot be reused, and one marked "USABLE ANTIFREEZE ONLY" for antifreeze that can be reused.

- ✗ Do not mix waste antifreeze with any other waste. Keep it separate.
- Do not ever dispose of antifreeze in a storm drain, septic tank or dry well.
- X Do not ever pour antifreeze on the ground.

Properly Managing BRAKE FLUID

ISSUE

Automotive repair shops occasionally deal with small amounts of brake fluid. Depending on the additives used, brake fluid may or may not be hazardous. However, it can become hazardous when it is contaminated with brake cleaner from a spray can, which contains chlorinated solvents. Because brake fluid is not crude-based, it should not be added to used oil.

DOs

- ✓ Collect brake fluid in a separate, marked, closed container and identify a waste hauler that will recycle it.
- ✓ Determine through testing if your brake fluid is hazardous, and manage it accordingly.
- If your brake fluid is determined to be nonhazardous, check whether the landfill will accept brake fluid absorbed with cat litter.

- X Do not put brake fluid into your used oil container.
- X Do not pour brake fluid down any drain or on the ground.
- X Do not spray brake cleaner around brake fluid.

Properly Managing CARBURETOR CLEANER

ISSUE

Automotive repair shops often have a 5-gallon bucket of carburetor cleaner that is used for degreasing parts. Methylene chloride (the chlorinated solvent frequently used) is toxic, persistent, and carcinogenic. Such cleaner becomes hazardous when it is no longer usable.

DOs

- ✓ Consider eliminating chlorinated carburetor cleaner and switching to a less hazardous, non-chlorinated cleaner.
- ✓ Keep the carburetor cleaner container closed when not in use to avoid evaporation.
- When carburetor cleaner is spent, contact a company to recycle it or properly dispose of it at a permitted hazardous waste disposal facility.

- Do not pour carburetor cleaner down any storm drain, or into a septic system, dry well, or sewer.
- Do not put sludge from your cold tank into the dumpster or on the ground.

Properly Managing FLOOR CLEANING WASH WATER

ISSUE

If the floors of the automotive repair shop are kept generally clean of spills and a non-toxic cleaner is used during routine floor cleaning operations, the wash water should not be hazardous. When good housekeeping is not practiced, however, wash water may contain heavy metals and grease that need to be treated before discharging to the sewer.

DOs

- ✓ Keep your floors as clean as possible at all times. Catch leaks before they spill onto the floor, and dispose of the residue in the appropriate waste container.
- Clean small, non-chlorinated spills immediately with absorbent. Sweep up the absorbent material and save for reuse until absorbing ability is gone. It can then be placed in the dumpster (with approval of landfill accepting it).
- ✓ Use absorbent pads to collect floor cleaning wash water. Wring out the pads into appropriate waste container when saturated.
- Check with the local sewer utility or city engineering department to verify where your drains lead. Most exterior drains and some interior drains are not connected to a sanitary sewer system, but instead are storm drains that lead directly to a ditch, stream, lake, or drywell. Discharging contaminated wash water into any of these may contaminate groundwater.
- ✓ Receive permission from your local sewer utility for your floor cleaning wastes to enter the sanitary sewer system.

- Do not dispose of absorbents contaminated with chlorinated solvents in a dumpster. These are hazardous wastes and should be disposed of accordingly.
- Do not allow floor cleaning waste water to flow into a storm drain (inside or outside) or dry well.

Properly Managing FREON

ISSUE

One of the single largest uses of chlorofluorocarbons (CFCs) in the United States is as a refrigerant in automobile air conditioners. These CFCs are more commonly known as freon. If improperly handled during the servicing of car or truck air conditioners, freon will be released into the atmosphere, contributing to ozone loss. Effective July 1, 1992, new federal laws made it illegal to knowingly release refrigerants such as freon into the atmosphere during the repair, servicing, maintenance, or disposal of refrigeration and air conditioning equipment. The refrigerant must be recovered by a qualified technician.

DOs

- ✔ Recycle waste freon on the premises using EPA-certified recycling or recovery equip ment.
- ✓ Keep records of the dates and quantities of freon recovered and recycled.
- ✓ Manage filters from freon recovery equipment as hazardous waste.

DON'Ts

X Do not evaporate or vent freon to the atmosphere. This is illegal!

Properly Managing HOT TANK SOLUTION

ISSUE

Some auto repair shops use hot caustic tanks for cleaning greasy parts. The tank solution is changed infrequently. When the solution is changed, however, the spent solution and sludge from the tanks typically become hazardous wastes due to their corrosivity and heavy metal content.

DOs

- ✔ Accumulate all sludge from hot tanks in a closed, marked container.
- ✓ Determine through testing if sludge is hazardous, and dispose accordingly.
- ✓ Contact the appropriate regional office of the Kentucky Division of Waste Management if you want to neutralize and/or separate metals from the solution.
- ✓ Consider alternative cleaning methods such as detergent-based parts washers.

- X Do not dispose of spent hot tank solution down any drain or on the ground.
- X Do not dispose of hot tank sludge in a dumpster or on the ground.

Properly Managing LEAD ACID BATTERIES

ISSUE

Lead acid batteries pose a potential threat to human health and the environment if improperly discarded. The two main components of these batteries are sulfuric acid (H₂SO₄) and lead. Sulfuric acid is highly corrosive, and lead has been been linked to central nervous system damage in humans and animals. Kentucky laws (KRS 224.50-410 thru 224.50-413) specify procedures for the lawful disposal of batteries.

DOs

- ✔ Properly dispose of batteries by delivering them to:
 - the wholesaler or retailer from whom you purchased the batteries,
 - a permitted secondary lead smelter,
 - a facility that recycles the batteries by extracting the lead, or
 - a collection center that sends batteries to a smelter or recycler.
- ✓ Avoid long-term storage of batteries. Dispose of them at least every 6 months.
- ✓ Store batteries upright in a secure, covered location. Check often for leaks.
- ✓ If a leak occurs, promptly report it to the appropriate DWM regional office or the 24-hour Environmental Response Hotline at 1-800-928-2380. Package and handle the spill as a hazardous waste.

- X Do not store batteries outside.
- X Do not place lead acid batteries in garbage to be collected.
- X Do not take lead acid batteries to a landfill.
- X Do not incinerate (burn) batteries.
- X Do not pour battery acid on the ground or into a drain.

Properly Managing PRESSURIZED SPRAY CANS

ISSUE

Brake cleaner and carburetor cleaner are often packaged in pressurized spray cans. When empty, these spray cans are not considered hazardous wastes. However, **partially empty** spray cans may be regulated as hazardous wastes because they contain ignitable, chlorinated solvents.

DOs

- ✓ Use up the contents of an entire spray can before starting another. Make sure that the can is completely empty before discarding it.
- If a spray can malfunctions (for example, the tip breaks off), return it to your supplier or handle it as a hazardous waste.
- ✓ Consider phasing out the use of spray cans in your shop.
- ✓ Use mechanical spray cans when possible.

DON'Ts

X Do not discard partially empty spray cans in the trash dumpster.

Properly Managing SHOP TOWELS

ISSUE

Depending on the way in which shop towels are handled, they may or may not become a hazardous waste. If towels are handled as recommended below, they are not likely to be a hazardous waste. If towels are being discarded, however, they will be considered a hazardous waste by characteristic if they fail any hazardous waste tests (e.g., ignitable, toxic).

DOs

- ✓ Use cloth towels that can be cleaned and reused.
- ✓ Keep soiled shop towels in a closed container that is clearly marked "CONTAMINATED SHOP TOWELS ONLY."
- Ask the laundry and/or recycler that services your shop if they discharge their waste water to the sanitary sewer system. Avoid using laundries and recyclers that discharge wastewater to a drain field.
- When possible, use less hazardous cleaning solvents (i.e., ones without chlorinated compounds).

- X Do not use disposable paper towels or rags.
- ✗ Do not throw dirty towels into your trash dumpster.
- Do not saturate towels. If you do, wring them out and reuse the liquid.
- X Do not dispose of solvents by pouring them into containers of used shop towels.

Properly Managing SOLVENTS AND SOLVENT TANKS

ISSUE

Waste haulers often provide parts washer solvent tanks for cleaning parts and tools. Solvents used include mineral spirits, Stoddard solvent, petroleum naptha, and xylene. When no longer useable, these and other solvents become hazardous wastes because they are ignitable and/or toxic. Always check the Material Safety Data Sheet (MSDS) to determine the proper disposal method for any solvent.

DOs

- ✓ Install a filter on your solvent sink to greatly increase the life of the solvent. Dispose of the filters as hazardous wastes.
- ✓ Make sure solvent is too dirty to use before it is exchanged for new solvent.
- Consider using less hazardous solvents or switching to a spray cabinet parts washer that does not use solvent.
- Consider purchasing your own solvent still and recycling solvent on-site. If you decide to recycle on-site, you must register with the Kentucky Division of Waste Management and follow applicable regulations.
- ✓ Keep a log of dates, recycled amounts, and batch make-up amounts.
- Remember that sludges, filters and still bottoms generated from on-site solvent recycling are typically hazardous.
- ✓ Keep different types of solvents in separate, clearly labeled, closed containers.

- Do not dispose of spent solvents by pouring them on the ground or into drains, or by evaporating them in the air.
- X Do not mix solvents with any other wastes.

Properly Managing SPRAY CABINET WASH WATER

ISSUE

Some automotive repair shops clean parts in a recirculating spray cabinet with a caustic cleaner. Wash water and sludge from this method of parts cleaning may be hazardous because of high lead content and/or corrosivity. Excess oil and grease are also water quality concerns.

DOs

- Consider switching to a spray cabinet system if you are using only solvents to clean parts.
- Determine through testing whether your spray cabinet wastes are hazardous.
- ✓ Accumulate spray cabinet wash sludge in sturdy, closed containers and dispose of as a hazardous waste if necessary.
- Check with your sewer utility or city engineering department to find out where your drains lead—most outside drains and some inside drains do not go to a sewage treatment plant, but instead are storm drains that lead directly to a stream, lake or ditch or to drywells. Discharging contaminated water into any of these may pollute groundwater.
- ✔ Close off all drains that lead to storm sewers, dry wells, or septic systems.
- Check with your local sewer utility before discharging any wash water into the sani tary sewer system.

- Do not dispose of spray cabinet wash water down any storm drain, or into a septic system or dry well. This can cause water contamination and create liability problems for you.
- Do not dispose of spray cabinet wash sludge in the dumpster or on the ground.

Properly Managing SUMP SLUDGES

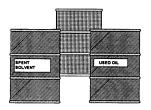
ISSUE

Sludges from your sump or oil/water separator may be a hazardous waste. You will need to test the sludge at a professional laboratory to determine if it is hazardous, or save testing costs by assuming the waste is hazardous and by managing it accordingly.

DOs

- ✔ Have the sludge tested when pumped out. Keep all records.
- ✔ If the sludge is a hazardous waste, send it to a permitted hazardous waste facility.

- **X** Do not put hazardous sludge in the trash dumpster or on the ground.
- Do not use a septic tank pumping service to remove this sludge. There is no legal, environmentally safe way for these services to dispose of the waste if it is hazardous.



Properly Managing TRANSMISSION FILTERS

ISSUE

Used transmission filters are exempt from state hazardous waste requirements (including testing) if the used oil and the filter casing (as scrap metal) are recycled. Unlike oil filters, transmission filters are generally flat, porous screens that do not retain oil on them. Therefore, they do not need to be crushed or split before being discarded.

DOs

- ✓ Keep used transmission filters in a container marked "USED TRANSMISSION FILTERS ONLY."
- ✓ Locate a scrap metal recycler who will take the transmission filters.
- Make a hazardous waste determination on processed filters if they are to be disposed of at a landfill.
- ✔ Put transmission fluid drained from filters in your "USED OIL ONLY" container.

- X Do not discard undrained filters in the trash dumpster.
- Do not discard drained filters in the trash dumpster without first making a hazardous waste determination and checking with the landfill that receives your waste to confirm whether the facility accepts filters.

Properly Managing TRANSMISSION FLUID

ISSUE

Transmission fluid is a crude-based petroleum product; it can therefore be managed the same as used motor oil. Hydraulic fluid, gear lube oils, metalworking oils and differential fluid are crude-based products as well. These waste oils are exempt from hazardous waste regulations if 1) they have not been contaminated by other wastes (such as solvents), and 2) they are sent for recycling or burned for energy recovery. Specifications for used oil fuel are contained in 401 KAR 36:050. Specific exemptions for these wastes are included in 401 KAR 31:010, Section 6.

DOs

- Manage used crude-based fluids in the same manner that you manage used oil.
- ✔ Review "Facts about Used Oil" in this booklet.

- Do not dispose of these fluids in a storm drain, septic tank, dry well, sewer system or dumpster.
- Do not accidentally contaminate your used oil container by mixing these fluids with even small amounts of brake cleaner, carb cleaner or other wastes. This could result in the entire load being classified as a hazardous waste.

Properly Managing USED OIL

ISSUE

Kentucky hazardous waste regulations exempt used oil if 1) it has not been mixed or contaminated with hazardous wastes, and 2) it is sent for recycling or burned for energy recovery. Specifications for used oil fuel are included in 401 KAR 36:050. Specific exemptions for used oil are provided by 401 KAR 31:010, Section 6.

DOs

- ✓ Keep used oil in a separate container, clearly marked "USED OIL ONLY."
- ✔ Place the container in a secure area. Train technicians to keep it secure.
- ✓ Keep records of used oil testing and shipment.
- ✓ Transfer oil only to a used oil transporter that is registered with the Kentucky Division of Waste Management (DWM).
- ✓ Contact your regional DWM office for guidance on used oil burners.

- X Do not pour used oil on the ground, even for dust suppression.
- ✗ Do not ever dispose of used oil in a storm drain, septic tank, dry well, sewer or dumpster.
- Do not mix used oil with incompatible wastes such as brake fluid, power steering fluid or used antifreeze.
- Do not mix used oil with even small amounts of brake cleaner or carb cleaner. This could contaminate the whole batch, making it a hazardous waste.
- Do not mix your used oil or "do-it yourselfer" used oil with any other waste if you plan to burn it in your shop for heating.
- Do not accept used oil from other businesses unless you have registered this activity with the Division of Waste Management.

Properly Managing USED OIL FILTERS

ISSUE

Used oil filters (except those from heavy duty trucks) are exempt from state and federal hazardous waste requirements, including testing, if they are recycled. Generators of heavy duty filters need to determine whether or not these are hazardous. Processed used oil filters may only be disposed of at a landfill after they have been determined to be non-hazardous.

DOs

- Used oil filters must be crushed, split or processed by other means to remove free oil from the filter. The filters must pass the paint filter test if they are being sent to a landfill.
- ✓ Keep processed filters in a separate container that is clearly marked "USED OIL FILTERS ONLY."
- ✔ Put oil drained from filters into your "USED OIL ONLY" container.
- ✓ If possible, locate an oil filter recycler who can recycle your filters.
- Check with the landfill that accepts your solid waste to determine whether processed oil filters are accepted.

DON'Ts

Do not put processed filters in the trash dumpster until you have determined that the filters are non-hazardous.

Properly Managing UNDERGROUND STORAGE TANKS

ISSUE

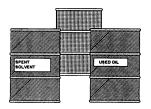
Leaking underground storage tanks (USTs) can cause fires or explosions that threaten human safety. Leaking tanks can contaminate nearby groundwater systems. Because so many citizens depend on groundwater for their drinking water supplies, state and federal laws and regulations for UST systems were enacted to safeguard groundwater resources.

DOs

- ✓ Register your underground storage tanks with the Kentucky Division of Waste Management, if required. This includes USTs containing motor fuel, new or used oils, new or used transmission fluids, new or used hydraulic fluids, etc. USTs larger than 110 gallons in capacity must be registered.
- ✓ Ensure that your tanks are in compliance with leak detection requirements.
- ✓ By Dec. 22, 1998, upgrade all tanks that were installed before Dec. 23, 1988 to meet spill, overfill and corrosion protection requirements. Contact the DWM for detailed information.
- Obtain financial assurance for corrective actions and third-party liability due to releases of petroleum. This can be obtained from the Petroleum Storage Tank Environmental Assurance Fund Commission (PSTEAFC), 911 Leawood Drive, Frankfort, KY 40601, (502) 564-5981.

DON'Ts

Do not remove any regulated underground storage tank without first notifying the Division of Waste Management, Underground Storage Tank Branch, 14 Reilly Road, Frankfort, KY 40601, (502) 564-6716.



Properly Managing WASTE TIRES

ISSUE

Kentuckians generate more than 3.8 million waste tires annually. It is estimated that more than 10 million tires are currently stockpiled or illegally disposed of in the state. When improperly managed, scrap tires pose a threat to public health and the environment. Waste tires are a preferred breeding site for the Asian Tiger mosquito, which is known to transmit various strains of encephalitis. Tire piles are also a serious fire hazard.

DOs

- ✓ Contract for the proper disposal of waste tires with a vendor approved by the Kentucky Division of Waste Management.
- ✓ Assure that your waste tires are disposed at a registered facility.
- ✔ Prevent the entrapment of water in tires by keeping them indoors or covered.

- Do not accumulate more than one hundred (100) waste tires without registering with the Kentucky Division of Waste Management and certifying compliance with the Waste Tire Control Program requirements.
- X Do not burn waste tires.

Where To Get More Help

It is your responsibility to safely manage wastes generated at your facility. However, don't be afraid to ask for help or guidance. For additional information and assistance, contact the nearest Division of Waste Management regional office.

Division of Waste Management Regional Offices

London Regional Offfice

Division of Waste Management 85 State Police Road State Regional Office Bldg. London, KY 40741-9008 (606) 878-0157

Frankfort Regional Office

Division of Waste Management US 127 South Annex Suites 1 & 2 1049 US 127 South Frankfort, KY 40601 (502) 564-3358

Hazard Regional Office

Division of Waste Management 233 Birch Street Hazard, KY 41701 (606) 439-2391

Morehead Regional Office

Division of Waste Management Mabry Building US 32 South Morehead, KY 40351 (606) 784-6634

Columbia Regional Office

Division of Waste Management 102 Burkesville Street P. O. Box 335 Columbia, KY 42728 (502) 384-4735

Florence Regional Office

Division of Waste Management 7964 Kentucky Drive Suite 8 Florence, KY 41042 (606) 292-6411

Madisonville Regional Office

Division of Waste Management 625 Hospital Drive Madisonville, KY 42431 (502) 825-6532

Louisville Regional Office

Division of Waste Management 312 Whittington Parkway Suite 201 Louisville, KY 40222-4925 (502) 595-4254

Bowling Green Regional Office

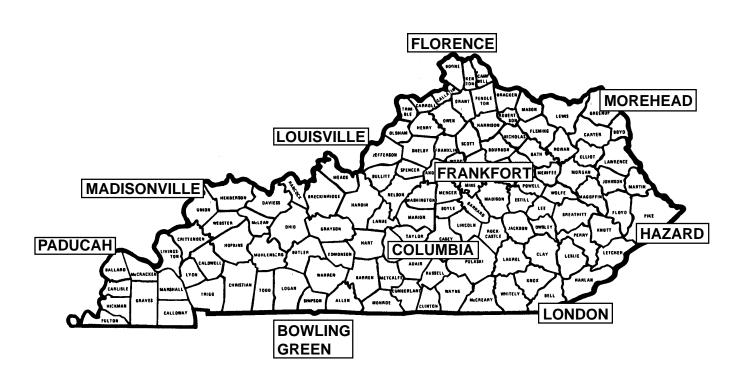
Division of Waste Management 1508 Weston Avenue Bowling Green, KY 42104 (502) 843-5475

Paducah Regional Office

Division of Waste Management 4500 Clarks River Road Paducah, KY 42001 (502) 898-8495

Central Office

Kentucky Division of Waste Management Frankfort Office Park 14 Reilly Road Frankfort, Kentucky (502) 564-6716



Important Note

This booklet summarizes some of the general requirements for generators of automotive waste. However, it does not replace state regulations. Always refer to the regulations and/or contact the nearest office of the Kentucky Division of Waste Management for detailed information about regulatory requirements.